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Personal Summary of Mitretek's Personnel

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NANP Administration Functional Requirements

4.0   NANP Administration Functional Requirements

Mitretek fully complies with and meets all requirements specified in Section 4.0 of the

NANC Requirements Document. ■

4.1   General Responsibilities

Requirement 1:   Assign and administer NANPA resources in an efficient, effective, unbiased, and non-discriminatory manner.

Requirement 2:   Support the industry's efforts to accommodate current and future numbering needs, and advise the industry relative to numbering issues.

The new NANP Administrator's primary responsibilities set in these two requirements are based on provisions of the Telecommunications Act of 1996, FCC 96-98 and 96-333, and the Requirements Document developed by the NANC.

Mitretek will fully comply with these requirements. In responding to these requirements, Mitretek brings strong practical understanding of the NANP. This practical understanding is gained by the broad-ranging experience of its personnel; the team it has brought together to respond to the NANC's Requirements Document; and its 30 years of practical experience in architecture, design, procurement, implementation of sophisticated telecommunications networks and operations.

General Responsibilities

As a result of our practical experience, Mitretek is prepared and fully qualified to carry out the NANPA functions of administering NANP resources and developing the necessary systems and interfaces.

Mitretek understands its critical role as NANP Administration to support the provision of number administration in an impartial, pro-competitive, manner. Under the newly created NANC, NANPA will function for the first time directly under the control of the telecommunications industry through its members on the Council and its ultimate function as a Federal Advisory Committee to the FCC. We understand that policy will now appropriately reside entirely in the hands of the industry and its regulators.

It is essential that the new NANPA maintain and foster an integrated approach to number administration throughout North America. Mitretek, in its solution, has demonstrated its

General Responsibilities

intent to reach out to all member nations served by the NANP. It has included representatives of non-U.S. countries as part of its Staffing Plan.

It is also essential for the new NANPA to assist industry-led efforts to strengthen number administration. By providing informed staff with current and efficient access to resource data and appropriate referral of policy issues to the industry, Mitretek will work to support industry activity in the development of number policy and administration.

It is the clear understanding of Mitretek as the new NANPA that industry guidelines govern the management of precious numbering resources. We understand that the NANPA serves as a resource to the NANC, INC, CSCN and other fora. Mitretek has long participated in U.S. and international industry bodies and has attended INC meetings since its inception. We intend to continue to participate so as to assist those entities in fulfilling their charters and supporting their roles in recommending regulatory actions.

Mitretek's design of the new NANPA reflects the importance it places on operations focusing on local, state, and regional market and regulatory developments. We recognize that NPA Relief Planning and COCA activities must reflect local market activity and state regulatory priorities and directives. Our entire NANPA organization will be responsive to these local dynamics as they lead to numbering resource requirements and NANPA services.

General Responsibilities

The NANP serving area includes 19 sovereign nations: Anguilla, Antigua & Barbuda, Bahamas, Barbados, Bermuda, British Virgin Islands, Canada, Cayman Islands, Dominica, Dominican Republic, Grenada, Jamaica, Montserrat, St. Kitts & Nevis, St. Lucia, St. Vincent & the Grenadines, Trinidad & Tobago, Turks & Caicos Islands, and the United States.

Each of these countries holds the Right of Plenary Authority over the NANP resources assigned to it. The designated federal regulatory authority in each NANP country is responsible for ensuring that their country's rights and policies relative to participating in a shared NANP are met.

NANPA recognizes this and acknowledges that the final authority for all NANP related decisions involving a NANP country rest with that country's federal telecommunications regulatory authority.

In consideration of the above, NANPA will develop and maintain a list of the designated federal regulatory authority in each NANP country. NANPA will endeavor to establish and maintain a working relationship with all NANP regulatory authorities. To initiate this activity, the new NANPA will contact each NANP regulatory authority to apprise them of the change in NANP Administration, the rationale behind it, the new mandate and reporting structure, and most importantly, the on-going commitment of NANPA to

General Responsibilities

recognize and respect the rights of all NANP nations. On an on-going basis, as is stated explicitly throughout Section 4.2 of the response, NANPA will consult with the designated federal regulatory authority whenever an issue involving their country arises in the course of our administration of the NANP resource. It is also noted that under certain circumstances (i.e., those defined in Section 10.0 of the NPA Allocation Plan and Assignment Guidelines), NANPA has an obligation to canvas all NANP federal regulatory authorities seeking their comments on any proposed changes to the make-up of the NANP (e.g., adding a new country/territory).

Mitretek also understands the lead role played by the FCC and NANC in managing the shared NANP resource. The new NANPA will keep the NANC fully apprised of all dealings and issues involving NANP participating countries. In addition, NANPA will apprise NANC if and when regulatory authorities other than the designated federal authority (e.g., state regulators) are involved in a NANP related issue. ■

Requirement

4.1.2 Cooperate With and Actively Participate In Numbering Standards Bodies and Industry Fora Including the Canadian Steering Committee on Numbering

Mitretek will fully comply with this requirement.

General Responsibilities

The on-going design integrity and operational functionality of the NANP is in large part the result of activities in multiple industry fora and standards bodies which operate in the area served by the NANP. Principally, these committees are U.S. based (e.g., INC, NIIF, OBF, ANSI-T1). However, Canadian (e.g., CSCN) and Caribbean region industry committees also exist to focus on numbering issues which are peculiar to their geographic area.

NANPA must view these committees from two distinct perspectives. First, NANPA must be prepared to offer information (e.g., assignment data, statistics, guideline interpretation) and advice to any industry body seeking such information. Second, Mitretek must look to these industry bodies to provide the support that NANPA needs (e.g., resolve issues, establish standards and procedures) to successfully carry out its North American numbering administration responsibilities.

The new NANPA will meet these needs and obligations by supplying knowledgeable, empowered representation to industry fora meetings. The principal objective will be to achieve as much as possible, as quickly as possible, through full and constructive participation in the industry fora process. A secondary goal will be to enhance NANPA's reputation as a competent, evenhanded custodian of NANP resources. For example, Mitretek will provide new NANP information systems capable of generating statistics, trends and other measurable data visually illustrated by various reference bases (e.g.,

General Responsibilities

geography, carrier) to enable informed decisions in policy making by the NANC and in

NANPA assignment processes. ■

Requirement

4.1.3   Represent the NANP to National and Global Numbering Bodies

Mitretek will fully comply with this requirement.

ITU Study Group 2 (Network and Service Operation) is responsible for the development

of international standards (recommendations) which govern the assignment and allocation

of international numbering resources. These standards establish numbering principals

(Reference: Rec.E.164) which are in turn applied and adhered to by the NANP. In

addition, many complex international numbering issues (e.g., UIFN, definition of network,

carrier identification) which are dealt with at Study Group 2 have a direct impact on the

NANP and, perhaps more importantly, the participating North American carriers.

Mitretek will monitor the number and addressing activities in Study Group 2, and

wherever possible use the knowledge gained to enhance the NANPA operation. ■

General Responsibilities

Requirement

4.1.4   Attend U.S. Study Group A Meetings and Maintain Working Knowledge of

Study Group 2 ITU Activities

Mitretek will fully comply with this requirement.

In the United States, U.S. Study Group A is responsible for dealing with ITU-T Study Group 2 matters including developing U.S. positions, approving U.S. contributions, and in general, organizing the U.S. delegation to Study Group 2. There are obvious benefits to NANPA participating in Study Group A which include becoming knowledgeable of the standards which govern international numbering, understanding issues and their resolution, and most importantly, representing the interests of the NANP.

The ITU is a United Nations organization whose membership is primarily based on national affiliation. As a result, U.S. Study Group A is a purely United States committee. Other NANP member nations have their own national standards bodies (e.g., Canadian National Study Group 2) and participate in ITU Study Group 2 under their own flag.

Mitretek will attend U.S. Study Group A meetings and maintain a working knowledge of Study Group 2 activity (reference Section 4.1.3) on behalf of the U.S. telecommunications industry. ■

General Responsibilities

Requirement

4.1.5 Review Requests for All Numbering Resources and Where Necessary Refer

to Appropriate Industry Forum and Participate In Solution Development

Mitretek will fully comply with this requirement.

The heart of the NANPA function is receiving and reviewing requests for numbering resources for existing and new telecommunications services. As the new NANPA and a completely neutral entity, Mitretek will handle all requests for existing and new services in an evenhanded manner. Mitretek recognizes that it is the NANPA's role to assign resources, an administrative role, rather than allocate resources, a policy role. Mitretek will conduct assignments in accordance with industry guidelines and policies adopted by the NANC. New industry guidelines directing resource allocation will be sought should sufficient guidelines not exist for a new application.

The new NANPA will receive requests for number resources that enable existing carriers and new entrants to implement new applications and services under the direction of the NANC. In the absence of approved industry guidelines, the Mitretek NANP Administrator will promptly refer the request within the context of existing related guidelines to the NANC or other industry fora upon the direction of the NANC. In the course of industry discussion and resolution of the request for new resource allocations, the NANPA staff will assist in determining if existing NANP numbers are appropriate and

General Responsibilities

will identify such resources along with the level of assignment of each necessary to fulfill the request.

Mitretek recognizes that satisfaction of new application resource requests may ultimately require multiple resources (e.g., line numbers, central office codes, area codes) and will use its full research capability to perform a full analysis to support the development of a sound long-term solution. ■

Requirement

4.1.6   Maintenance of Necessary Administrative Staff: Legal, Financial, Technical, Equipment, Facilities, and Billing

Mitretek fully complies with the above requirement. ■

4.1.6.1   Legal

Mitretek has long experience with interacting with policy, legislative, and regulatory officials in a ministerial function for its clients. Also, Mitretek will name a NANP Administration Legal Counsel who will provide regulatory liaison for state, federal, and other nation regulatory matters impacting the NANP. Also, we will populate our staff centrally and in regional offices with individuals possessing regulatory experience to enable monitoring and interpretation of regulatory events impacting NANPA operations. ■

General Responsibilities

4.1.6.2 Financial

Mitretek's financial records are reviewed by outside auditing firms, the Defense Contracts Audit Agency, and regular peer review. Mitretek's Chief Financial Officer and financial staff are available for interview by the NANC or its designees. ■

4.1.6.3 Technical

Mitretek has a skilled systems engineering, network design, and telecommunications analysis staff. An outline of our personnel, their skill areas, experience level, and education level is shown elsewhere in this document. Mitretek's Center for Telecommunications and Advanced Technology is recognized for its expertise in telecommunications technology, technology forecasting, and telecommunications acquisition, modeling, and services costing.

The Mitretek support system architecture, described in Section 9.2, will be developed and supported by Mitretek's sophisticated system designers and developers who will implement the data models, and database structures. Mitretek systems operation, maintenance, and customer service personnel will be drawn upon as a cost effective shared resource to support on-going NANPA operations as required.

Although the information systems support both NANP Administration and CO Code Administration functions, and there will be many common elements to the systems, there

General Responsibilities

will also be specific solutions targeted to the NANP Administration Function. This

function will have Mitretek development and operations staff available to respond quickly

to the unique needs of the NANP Administrator. ■

4.1.6.4 Equipment and Facilities

Mitretek's Facilities Department will provide all services necessary to establish the NANP

Administration offices in McLean, Virginia. Space and equipment engineers will design

and oversee the building and preparation of the space, ensure its design integration with

information and communications systems, and evaluate and purchase required equipment

and furnishings. ■

4.1.6.5 Billing

Mitretek will not provide billing services. ■

Requirement

4.1.7 NANPA Will Be Managed in Accordance With Published Guidelines and Refer Requested Decisions and Interpretations Required in Absence of Guidelines to Appropriate Industry Body

Mitretek will fully comply with this requirement.

General Responsibilities

NANPA assigns numbering resources under its purview per industry developed, approved, and maintained assignment Guidelines. Mitretek will refer requested decisions and interpretations required in absence of guidelines to appropriate industry body. Modifications to the assignment guidelines are affected by consensus in the appropriate industry forum (e.g., Industry Numbering Committee (INC), Committee T1, and Canadian Steering Committee On Numbering (CSCN)). ■

Requirement

4.1.8 Respond to Information Requests for Information From the Industry and Regulators

Mitretek will fully comply with this requirement.

The NANPA is the central repository for all numbering data, documentation, and historical and current information about the NANP. As a result, the Mitretek NANPA staff stands ready to respond to all inquiries relative to the NANP and its resources. This includes but is not limited to status information for specific resources (e.g., NPA Relief Planning) as well as information and assistance with application processes for resources.

Mitretek staff will track state and federal, Canadian, and Caribbean regulatory issues relating to the NANP. We will remain current and informed about issues and proceedings relative to regulatory activity. Further, the Mitretek NANPA will serve as a resource to